



JPA Tanker Wash Guidelines: Sanitary Transportation Through Standardization

By Nicholas Lowe-Hale

A Freer Consulting Co. White Paper

With more layers and steps being added in every supply chain, especially in food production, the need for standardization to protect against contamination is more important than ever. This consistency, for a tank wash customer, means they can rest assured knowing they will not need to recheck quality because they will be able to get the same wash anywhere, regardless of location, while ensuring its effectiveness. For carriers with in-house washing, this certification means they can prove to their customers that their washes are effective and can meet customers' needs.

For every set of standards or guidelines implemented, the major questions are about their extensiveness, their benefit, how much change is needed, and whether they are legally mandated. While the Juice Products Association (JPA) guidelines are not a legal mandate, they are the standard under which the industry operates, and are now required for washing juice product tankers. The guidelines cover the wash process, outlining the individual washes, standards of the facility, and documentation. The organization of the wash facility will dictate the level of change necessary. This paper covers the guidelines and what these changes do for tank washes, incorporating some lessons learned from implementation.

Overview of the JPA tanker wash guidelines

The Model Tanker Wash Guidelines serve to standardize wash procedures, providing the minimum cleaning requirements for tankers hauling juice products. Through the guidelines and a JPA supplied audit checklist, the standard seeks to define both the general process of a tanker wash, and the specific requirements to eliminate allergens and pathogens. The standard includes guidelines for the facility, the tankers themselves, each of the five JPA wash types, accessory cleaning, seal procedures, and record keeping.

For the facility and the tanker, the standard seeks to ensure that everything used is food grade and with sufficient protection from contamination. A wash facility should be enclosed with two doors, use potable water, cater only to food grade tankers, and be able to document the wash process and show proof of potable water use. Every part of the tankers used must be food grade, must be taken apart piece by piece for cleaning, and can only haul "approved food products, ingredients, or potable water" (JPA Model Tanker Wash Guidelines). Any facilities with an automated clean-in-place (CIP) system must have a defined swab or ATP testing procedure to check the effectiveness of the system.

The washes range from a tanker turnaround, where there is no wash and filling with the same product occurs within twelve hours, to a stringent high temperature wash. Each wash is designed to handle a different type of juice product, from water based products (a type 2 wash) to specialty ingredients such as wine (a type 5 wash). The type 1 wash is a customer specified potable water rinse between loads of the same product, and a type 3 wash is for water-oil mixtures, oil based products & allergens. Additionally, the standard goes through the steps and requirements for cleaning pumps, hoses, fittings, and valves that cannot be cleaned on the tanker. The standard outlines the steps and minimum requirements for each wash.

A major part of the JPA guidelines is documentation from the wash process to the sealing of a cleaned and sanitized tanker. A wash ticket is the primary form of documentation, detailing the type of wash done, the last three products hauled, the seal codes, and the employee in charge of the wash. A copy of the wash ticket is sent with the tanker and a record must be kept

for a minimum of three years. Another significant piece of documentation is the Hazard Analysis and Critical Control Points (HACCP) plan. The JPA guidelines require a HACCP plan with identified critical control points be done for each of the wash types. This ensures a thorough understanding of the wash process and adequate planning for steps that can introduce hazards into the sterile tanker and juice product. Other records for procedures and maintenance associated with the JPA guidelines may be required to prove compliance.

What does this do for tanker washes, who needs this, and why?

This standardization does not come without some changes and updates to wash processes and record keeping. In some cases, automated wash cycles must be changed to meet the guidelines, and physical wash environments may need updating to meet the standard. These standards are written to be integrated into most wash facilities, so many of these changes should not entail large shifts in policies or practices. Items, such as the Good Manufacturing Practices (GMPs) that the JPA requires, are also requirements under CFR 117:21, and should already be in place. One large shift that may be needed is the gathering of records for each aspect of compliance. Once a recordkeeping method is established, this process can be streamlined with past documents being rolled into the structure. These can be implemented to make positive changes to the business and compliance structure.

The benefits of these changes outweigh the minor difficulty of performing them. As stated above, the goal of these guidelines is to standardize juice product washes provided by tanker wash facilities. A facility that has a JPA certification should have the same minimum standards and practices that any other facility has, ensuring the customer that the tanker will be washed in a way that eliminates pathogens and allergens. The guidelines also provide a framework that can streamline the workflow of a facility. By following the guidelines, keeping required documentation, as well as adhering to other regulations and laws, some legal protection is gained if contamination of a product occurs in a washed tanker, since the facility can either track the exact issue and address it before the tanker leaves or prove that the standards were met—indicating contamination at another point in the chain of custody post-wash.

Obtaining this certification also opens new market opportunities. For an independent tank wash facility, being able to provide these washes means the ability to gain new clientele and more business. For companies with internal tank wash facilities, these certifications enable the organization to keep tank washes within the company, instead of going to a third party, saving time and money.

Quick Lessons from the Field

Implementation of the JPA manual has provided a few lessons on integrating the standard into existing tanker wash operations. Two subject areas where some lessons originate are in the interpretation of the guidelines as they compare to existing practices, and the documentation and record keeping process. Implementing the standards into an existing tanker wash operation comes with challenges and benefits. If the documentation is not in place or does not match up with what is needed, it will have to be overhauled. When possible, current wash documentation systems can be updated to fit the standard, allowing for smoother records integration.

In Conclusion

The Model Tanker Wash Guidelines aim to standardize the wash procedures for tankers hauling juice products. For the facility as well as the tanker, the guidelines ensure that only food grade equipment is used and the chance for contamination is reduced. The washes cover as many different juice types as possible, from water to oil based, with procedures that eliminate allergens and pathogens present in each. From the first washing request to the sealing of a clean tanker, JPA guidelines document and ensure that every step is followed and a customer can clearly see what was done. The JPA guidelines do require some updates to wash processes and record keeping, but these changes are ultimately beneficial. Obtaining this certification opens new market opportunities and helps an organization streamline its operations.

To learn more about how Freer Consulting Co. can help with your JPA certification, visit our website at www.freerconsulting.com or contact us at info@freerconsulting.com.